



November 7, 2025

Director Scott Kupor  
Office of Personnel Management  
U.S. Office of Personnel Management  
1900 E Street, NW  
Washington, DC 20415-1000

Dear Director Kupor,

On behalf of the approximately 190,000 Physician Associates/Physician Assistants (PAs), the American Academy of Physician Associates (AAPA) writes to thank you and the Administration for your work to move the federal government toward a system of skills-based hiring to better meet the needs of taxpayers and federal agencies. AAPA would like to take this opportunity to share our views on how the reforms you are driving related to skill-based hiring can improve the federal healthcare provider workforce and ensure the best-qualified candidates with core skills are hired to fill open positions.

AAPA appreciates the move toward skills-based hiring promoted in the final rule, “Reinvigorating Merit-Based Hiring Through Candidate Ranking in the Competitive and Excepted Service (Rule of Many).” In formalizing the “rule of many” introduced in the 2019 National Defense Authorization Act and implementing President Trump’s Executive Order, “Reforming the Federal Hiring Process and Restoring Merit to Government Service,” the Office of Personnel Management (OPM) has recognized the importance of hiring based on the skills and training necessary for jobs in the federal government. Skills-based hiring is especially important for federal healthcare positions that serve to keep the federal workforce healthy, and which often address critical healthcare staffing shortages. **AAPA strongly urges you to, consistent with this rule, ensure that PAs and other qualified providers are eligible for job postings throughout the federal government for which they are qualified. Limiting who can fill a position based on professional title unnecessarily places severe limits on the federal government’s ability to fully utilize the healthcare workforce.**

PAs improve access to care while providing high levels of quality and patient satisfaction on par with physicians.<sup>1</sup> PAs work to ensure the best possible care and outcomes for patients by promoting health, wellness, and disease prevention, while also diagnosing and treating acute and chronic diseases. The proven value of the PA profession has made it one of the fastest growing occupations per the Bureau of Labor Statistics, with a projected 20% increase in PAs from 2024 to 2034, compared to 3% employment growth for physicians. Of the estimated 1.5 million healthcare providers in the U.S in 2034, about 50% of them will be physicians and 50% will be PAs and other non-physicians.<sup>2,3</sup> This growth projection, along with the qualifications of PAs, suggests an increased utilization of PAs within the federal government, and elsewhere, would improve access to high-quality, efficient care.

Further, PAs practice medicine in all 50 states and the District of Columbia, U.S. territories, and the uniformed services. PAs also practice in all medical specialties. As such, PAs are already well-positioned to increase access

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<sup>1</sup> American Academy of Physician Associates. [What is a PA?](#). Accessed October 2, 2025.

<sup>2</sup> U.S. Bureau of Labor Statistics. [Occupational Outlook Handbook: Physician Assistants](#). Accessed October 8, 2025.

<sup>3</sup> U.S. Bureau of Labor Statistics. [Occupational Outlook Handbook: Physicians and Surgeons](#). Accessed October 8, 2025.

to care and to fill critical healthcare shortages, especially if they are not arbitrarily excluded during federal hiring processes.

Nevertheless, PAs and other qualified healthcare providers are too often inappropriately excluded from being hired for federal healthcare roles for which they are highly qualified. This happens when a federal HR or Hiring Manager posts a job title or job description limiting applicants to only those licensed in certain healthcare professions, despite the fact that other providers also have suitable training and skills for the role. When a PA has the skill and merit needed for a federal healthcare job, it is important for the ability of the federal government to expeditiously fill these critical positions that PAs be eligible to apply. The federal government should not limit a position based on professional title, such that only a physician, or only a nurse practitioner, or only a PA is eligible for a position when a well-qualified provider from any of those three professions has the appropriate skills for the position. Title-based job posting is outdated and significantly limits the talent pool for a posted position.

Unfortunately, AAPA has heard from its members that outdated hiring practices that arbitrarily limit healthcare jobs to certain professions are rampant in federal agencies, including the Indian Health Service, civilian Department of War health facilities, the Veterans Health Administration, the Bureau of Prisons, and other agencies. This is both inconsistent with President Trump's executive order on restoring merit-based hiring in the federal government, and inconsistent with OPM's final rule which seeks a "federal workforce that is capable, mission-driven, and reflective of American values [b]y modernizing job titles and embracing skills-based hiring." In the private sector, many hiring managers have the flexibility to fill job postings with either a physician, PA, or NP, depending on job duties and candidate qualifications. Unfortunately, if a federal position is assigned to one specific provider type, no other qualified provider who can perform the duties required of the position can be considered unless the position description is updated and the position is reposted.

AAPA encourages OPM to work across federal agencies to update healthcare position descriptions and qualification requirements to ensure all eligible health professions that are qualified to perform the duties of the position can apply.

We were encouraged to see that OPM is already implementing its rule and the President's executive order by instructing HR Managers to, "take action steps to audit and revise job titles and descriptions to ensure they are descriptive, organizational, or functional job titles that resonate with jobseekers," and to, "review and update working titles for incumbents, to ensure consistency, clarity, and alignment with evolving roles and responsibilities."<sup>4</sup> This period of auditing, revision, and updating of job titles gives OPM an important opportunity to further advance its goal of delivering a "a civil service hiring process that attracts the most qualified applicants and gives hiring managers the opportunity to in fact hire on that basis"<sup>5</sup> for Americans by ensuring PAs and other providers are not arbitrarily excluded from federal health care positions because of outdated job titles and job descriptions that are not merit or skill-based.

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<sup>4</sup> United States Office of Personnel Management. [Memorandum for Chief Human Capital Officers: Job Titling Guidance in Alignment with Executive Order 14170 and the Merit Hiring Plan](#). September 9, 2025. Accessed October 2, 2025.

<sup>5</sup> Scott Kupor, Director, United States Office of Personnel Management. [The Rule Of...](#) September 8, 2025. Accessed October 3, 2025.

Once again, AAPA thanks OPM for its emphasis on cultivating a talented federal workforce with the skills appropriate for the services Americans need. We would welcome the opportunity to meet with you to further discuss this issue, and if you have any further questions, please contact Tate Heur at [theuer@aapa.org](mailto:theuer@aapa.org) or at 571-319-4338.

Sincerely,

A handwritten signature in black ink that reads "Lisa M. Gables". The signature is written in a cursive style with a large initial "L" and "G".

Lisa M. Gables, CPA  
Chief Executive Officer